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Attorney for Plaintiff Thomas Mooney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THOMAS MOONEY,

Plaintiff,

v.

FIFE DERMATOLOGY, PC, d/b/a
SURGICAL DERMATOLOGY & LASER
CENTER; DOUGLAS FIFE, M.D.; and
HEATHER FIFE,

Defendants.

CASE NO. 2:17-cv-02191-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS' MOTION
FOR ATTORNEY FEES**

(First Request)

The parties, pursuant to LR IA 6-1, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to Defendants' MOTION FOR ATTORNEY FEES (ECF No. 90) from the current due date of Monday September 26, 2022 through and including **Monday, October 10, 2022**. The Parties further stipulate that Defendants shall have up to and including **Friday, October 28, 2022** to file their reply in support of Defendants' MOTION FOR ATTORNEY FEES (ECF No. 90).

This is the first request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

The parties request approval of this stipulation by the court for the following reasons:

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1. Plaintiff's counsel, Mr. Kemp, was on vacation out of the country on a long-planned cruise from September 1, 2022 through September 16, 2022 which prevented him from devoting the necessary time to work on this matter until he returned to the office on September 19, 2022;
2. Plaintiff's counsel, Mr. Kemp, also has to travel to Tonopah, Nevada and Denver, Colorado for depositions in other matters on September 26 and September 28. He then has a CLE conference at the Nevada Justice Association annual convention in Denver the remainder of next week;
3. The Parties have further agreed to extend the time for Defendants' Reply to **Friday, October 28, 2022** to account for time-intensive obligations in other matters, including, but not limited to, preparing for and assisting with Day Four of a continued evidentiary hearing set for October 26, 2022 in Case No. 2:20-cv-00406-RFB-BNW.
4. There are no other deadlines or proceedings with which this extension would interfere.

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1 This stipulation to extend the Response *and* Reply deadlines on Defendants' Motion
2 for Attorney Fees (ECF No. 90) (to Monday, October 10, 2022 and Friday, October 28,
3 2022, respectively) is brought in good faith and not for purposes of delay.
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5 DATED this 26th day of September, 2022.

DATED this 26th day of September, 2022.

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8 /s/ Hayley Cummings
9 P. SWEN PRIOR, ESQ.
10 HAYLEY CUMMINGS, ESQ.,
11 SNELL & WILMER
12 3883 Howard Hughes Pkwy., #1100
13 Las Vegas, NV 89169
14 Attorney for Defendants

/s/ James P. Kemp
JAMES P. KEMP, ESQ.
Bar No. 6375
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Las Vegas, NV 89130
Attorney for Plaintiff

15 **ORDER**

16 IT IS SO ORDERED:

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18 UNITED STATES DISTRICT JUDGE

19 DATED: September 26, 2022
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